

FILED

United States District Court  
Eastern District of Virginia

Alexandria Division

2024 FEB -3 A 11:54

**PAUL SHAO,**

**Plaintiff,**

**v.**

**ALLSTATE INSURANCE COMPANY,**

**Defendant.**

**Civil Action No. 1:23-cv-00809**

**Jury Trial Demanded**

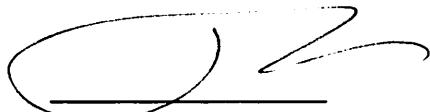
**PLAINTIFF'S MOTION FOR LEAVE TO FILE SUBPOENAS**

Plaintiff Paul Shao ("Shao"), *Pro Se*, respectfully moves this Court for leave to file two subpoenas to testify at a deposition in a civil action, which are associated with two Notices of Deposition for Ann M. Smith and Bryan E. Reid. The depositions have been approved by the honorable judge William Fitzpatrick on 2-5-24 and the honorable also states, "The depositions of non-parties are commanded by subpoena with notice to the parties before service." (Dkt. 82.) These subpoenas are thus part and parcel of the depositions ordered. In an ordinary situation an attorney can sign such a subpoena without asking permission from the Court. However, Plaintiff is a pro se litigant, who cannot sign a subpoena and has to ask the Clerk to sign the integral subpoena to the deposition, as ordered.

Plaintiff was told by the clerk of court on 2-7-24 that Ms. Meredith Bayer, clerk to the honorable, indicated to her that Plaintiff needed to file a motion for leave to file subpoena for the office of clerk to issue the subpoenas. Plaintiff thus dutifully obliges.

**DATED: January 8, 2024**

**PAUL SHAO,**  
*Pro Se Litigant*

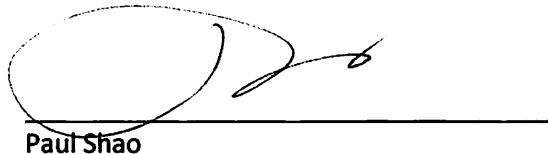


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### **CERTIFICATE OF SERVICE**

I certified that on January 8, 2024, a copy of the foregoing Declaration of Paul Shao was filed with the clerk's office of the Court, emailed, and mailed to Defendant at the following address:

J. Scott Humphrey  
Katie M. Burnett  
Meghan Golden  
**Benesch, Friedlander, Coplan & Aronoff LLP**  
71 South Wacker Drive, Suite 1600  
Chicago, Illinois 60606-4637  
[shumphrey@beneschlaw.com](mailto:shumphrey@beneschlaw.com)  
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[mgolden@beneschlaw.com](mailto:mgolden@beneschlaw.com)

  
Paul Shao

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
DIVISION

FILED

Paul Shao

Plaintiff(s),

v.

2024 FEB - 8 AM 11:54

Civil Action Number: 1:23-cv-00809

Allstate Insurance Co.

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

plaintiff's Motion  
for Leave to file  
(Title of Document)

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

Subpoena

Paul Shao  
Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: 2/8/24 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of

(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type))

Signature of Pro Se Party

Executed on: \_\_\_\_\_ (Date)